

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|---|---|----------------------------|
| VISHVA DESAI, on behalf of herself and others similarly situated, et al. |) | |
| |) | |
| Plaintiffs, |) | Honorable Elaine E. Bucklo |
| |) | |
| v. |) | No. 11 C 1925 |
| |) | |
| ADT SECURITY SERVICES, INC., et. al. |) | Magistrate Judge Keys |
| |) | |
| Defendants. |) | |

**ELEPHANT GROUP INC.'S MOTION FOR EXTENSION OF TIME
TO PRODUCE DOCUMENTS**

NOW COMES the third party defendant, Elephant Group, Inc., by and through undersigned counsel, and hereby moves this Court to extend the deadline to produce documents referenced in the Court's Order of July 11, 2012. In support thereof, Elephant Group states as follows:

1. On July 11, 2012, this Honorable Court granted plaintiff's motion to compel and ordered that Elephant Group produce all records of ADT installations, including any accompanying e-mail correspondence, through its affiliates Paramount Media Group, Inc. and Savilo Support Services, Inc., its insurance policies and documents in un-redacted form. [doc. 206]. The documents were to be produced by August 3, 2012.
2. Elephant Group, Inc. has been working diligently toward producing all of the aforementioned documents, but the process has been extremely burdensome.

3. Elephant Group has produced all of its insurance policies since 2006 and has produced un-redacted copies of documents that were previously produced in redacted form. Elephant Group has produced thousands of pages of documents already.

4. Elephant Group is also producing records of ADT installations by Savilo and Paramount Media Group.

5. However, due to the volume of the records that are being produced, Elephant Group requests one additional week, until August 10, 2012, to produce the remaining materials.

6. Counsel for plaintiff was consulted before filing this motion and did not consent to the relief requested herein.

WHEREFORE, Elephant Group, Inc. respectfully requests that this Honorable Court extend the deadline to produce the aforementioned documents to August 10, 2012.

Respectfully submitted,

/s/ Daniel W. Pisani
One of the Attorneys For Elephant Group, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of August, 2012, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Daniel W. Pisani